

MINE FILE CHRONOLOGY

REDMOND CLAY & SALT COMPANY

M/039/002

June 10, 1991

- May 3, 1989 Division received two small mining NOI's from Redmond Clay and Salt Company (Redmond). One NOI for RCS Bentonite Mine and one for RCS South Salt Mine. A copy of the Utah Tax Commission 1988, Notice of Taxes was attached, to give legal location descriptions of the mines. Three properties are described as the South Salt Mine, the Clay Property, and the North Salt Mine.
- May 18, 1989 Division response letter to Redmond's two NOI's. The NOI's were found to be incomplete. A topographic base map was requested, along with clarification of whether Redmond was requesting a variance or not. Due to the Division's "onsite" definition, the Redmond properties would be considered a single large mine operation.
- May 25, 1989 Received memo from Redmond dated May 23, 1989, saying, "These forms are clearly for "Notice of Intention to Commence" a large mining operation. These forms do not apply to us. We have been extracting both salt and bentonite from our own private property for the last 29 years. If we are subject to regulation that requires us to comply with these forms, please send a copy of the regulations and the correct forms to be filled out."
- June 23, 1989 Letter to Redmond clarifying which forms and regulations would apply to their operation. A copy of the Act and Rules was attached. An onsite field inspection was requested with a date to be arranged.
- August 14, 1989 File memo regarding site inspection of July 11, 1989. The South Salt Mine was estimated to encompass 8-10 acres. This included the mill site. This mine consists of three tunnels at the base of an open pit. The tunnels are estimated to be 50-75 feet high and 20-30 feet wide. Historically, this area was mined for salt approximately 75 years ago. A number of sink holes are located west of the pit. Their development is theorized to be due to a breach in an irrigation canal which allowed water to infiltrate and dissolve portions of the salt deposit. The mine is

dewatered intermittently and a sub-surface drainage system was installed to intercept any drainage before it reaches the road.

The Bentonite Mine is north of the South Salt Mine and consists of several open stripped areas and a processing facility. This operation encompasses 5-6 acres of disturbance.

The North Salt Mine is north of the Bentonite mine and consists of an open pit with two tunnels at the base of the pit. This mine is being de-watered intermittently and an old abandoned mill facility is located nearby. After the inspection, a meeting was held wherein the permitting requirements were discussed. The Division would draft a letter to the operator which would discuss the field inspection and make recommendations on the information required in the LMO-NOI.

August 18, 1989

Letter to Redmond containing a brief summary of the information required to process an application for this operation. Redmond is referred to the rules for the specific requirements. The general requirements are:

- 1) prepare the permit application pursuant to the large mining operation requirements;
- 2) an accurate estimate of all disturbed surface acreage;
- 3) surface facilities map(s) with a disturbed area border;
- 4) a narrative description of the mining operation with a description of impacts to the environment and public safety;
- 5) a detailed reclamation plan for all disturbed areas; and
- 6) a reclamation surety.

September 13, 1989

Received LMO-NOI from Redmond.

October 12, 1989

Letter to Redmond. The Division has not completed an initial review of the NOI. The review is expected to be completed in the near future.

November 12, 1989

Certified letter to Redmond stating that the NOI is deficient. A list of items which must be addressed and a copy of the rules are attached. A response is requested within 30 days.

December 4, 1989	Received letter from Redmond dated November 27, 1989. Two maps are attached. Redmond feels some of the information requested does not apply to their operation and other information cannot be compiled without considerable cost. A copy of the deficiency letter is attached with comments in the margin. Redmond feels the rules and regulations are applicable to mining on public lands but not applicable to their operation. Their entire operation is on private land. They are three miles from the nearest town or highway and there is no way in which their operation can change the environment or affect the ground. They see no need to return the mining area to its original condition as the mining areas are inexhaustible and will never be abandoned.
December 19, 1989	Certified letter from Associate Director to Redmond, regarding the review of their revised LMO-NOI. Redmond's last letter voiced a reluctance to continue the permitting efforts. Redmond is asked to continue this process and contact the Division staff to establish a mutually agreeable schedule for completion of this process. A copy of the Act is enclosed.
January 5, 1990	Division request for the annual report for 1989 sent to Redmond.
January 10, 1990	File memo documenting phone conversation of January 8, 1990. Mr. Bosshardt (Redmond Operator) would like to coordinate a meeting with the Division with a doctor's appointment visit to Salt Lake. This is acceptable as long as the Division has one week's advance notice.
March 21, 1990	Received 1989 Annual Report from Redmond.
March 23, 1990	File memo documenting meeting at Division offices with Milo and Larry Bosshardt of Redmond. Topics discussed were: post mining land use; pre-mining vegetation; pit and highwall reclamation; subsidence potential; surface and groundwater impacts; regulation of private property; map requirements and reclamation surety. The operator agreed to acquire and develop supplemental information to address the areas discussed. June

4, 1990 was set as a tentative date to discuss and evaluate this supplemental information.

June 18, 1990

File memo documenting telephone conversation of June 1, 1990, with Milo Bosshardt of Redmond. Milo indicated one map has been completed. The Redmond Development Company was now interested in leasing the lands associated with the mine operation for the purpose of creating a tourist attraction. No formal agreement has been made at this time. This proposed post-mining land use would not allow reclaiming the mine site. The Division would take this new development into consideration.

July 31, 1990

File memo documenting site visit of July 20, 1990. Several maps were presented which covered the mining operations and outlined aspects of the proposed development. The operator was informed that portions of the mine site may qualify as a tourist attraction, but the Division could not accept classifying the entire mine site as an attraction. At this time, Redmond Clay and Salt is researching the legal and liability issues, in addition to the financial responsibilities.

The main points of discussion of this meeting were:

- 1) Redmond would not be held responsible for reclamation of pre-law disturbances;
- 2) DOGM would require certain measures to alleviate any safety hazards associated with pit highwalls or portals;
- 3) the reclamation surety would be based on third party costs, not the operator costs;
- 4) the reclamation cost estimate is projected 5 years into the future using an escalation factor;
- 5) the surety can be arranged in an account form where the operator receives the interest from the account;
- 6) the surety will be evaluated periodically and possibly increased or decreased;
- 7) concurrent reclamation may reduce the surety amount;
- 8) variances from the rules are granted if justification can be provided; and

9) facilities which have a valid post-mining land use may remain.

A brief tour of the mining operations was provided. Redmond was to provide an additional map which included a clay mining area, missing from the maps presented. The Division was to document the visit, review the maps and produce a preliminary reclamation estimate. Both parties would then continue with the permitting process.

October 3, 1990 Internal memo regarding review of the materials submitted by Redmond and a rough reclamation estimate. Information which would improve the accuracy of the estimate was listed. It was recommended that this estimate be evaluated by the minerals staff before sending it to the operator.

December 21, 1990 Letter to Redmond with a reclamation estimate attached. The estimate is to be considered a "rough draft" due to the number of assumptions it is based on. The estimate is for \$315,500 in 1995 dollars, covering approximately 61 acres of disturbance.

December 27, 1990 Request for 1990 annual report sent to Redmond.

January 5, 1991 Received letter from Redmond. A copy of the reclamation estimate is attached with revisions. The revised total is for \$47,800 in 1995 dollars. The Redmond Development Company has now leased the 100 acres now owned by Redmond Clay and Salt. This prohibits the salt company from doing any reclamation. If the development company pulls out, the mining land would become part of the farm grazing area, as it was originally and would become part of the Bosshardt Farming Trust. The portals would need to be closed, but trying to revegetate the pit floors is unreasonable since they were without vegetation originally. Existing roads should be left. Anything metal has salvage value, wood can be burned and buildings have a post mining use.

May 1, 1991 Certified letter to Redmond with a revised reclamation estimate. The rationale used in calculating this revised estimate is

Page 6
Redmond Clay and Salt Company
Chronology
June 10, 1991

presented. Redmond is asked to provide a surety in the amount of \$228,100 within 90 days of this letter. A Reclamation Contract form is enclosed for completion. Any supplemental information with regard to the estimate must be provided within 30 days. It is the Divisions statutory responsibility to review mining and reclamation permit applications. It is the operators responsibility to develop and submit these applications. Failure to meet these timeframes may result in a Notice of Agency Action, and/or Board Order requiring Redmond to appear before the Board.

May 6, 1991

Received letter from Redmond (dated May 3, 1991). Division demands are still unreasonable. Revegetation of the clay pits as with the salt pits, is unreasonable. All roads have post mining use, under the Redmond Development Company, Incorporated. "We will bond for \$160,000 which we feel is reasonable". Redmond requests paperwork for an Irrevocable Letter of Credit. [A copy of the latest reclamation estimate is attached with portions describing roads, the compressor and pump houses and clay pit floors highlighted].

jb
M039002